

EXHIBIT 1

Greenbrier County Docket

GREENBRIER HOTEL CORPORATION VS. ACE AMERICAN INSURANCE COMPANY

LINE DATE ACTION

1 06/23/17 COMPLAINT FILED - SUMMONS ISSUED
2 06/23/17 SUMMONS AND COMPLAINT GIVEN TO PROCESS SERVER FOR SERVICE
3 06/29/17 FIRST AMENDED COMPLAINT FILED - SUMMONS ISSUED
4 06/29/17 SUMMONS AND COMPLAINT GIVEN TO PROCESS SERVER FOR SERVICE ON:
5 07/10/17 ACE AMERICAN INS. CO. (DON HUNTER OF ACE)
6 07/12/17 LIBERTY MUTUAL FIRE INS. CO. (TO CORP. SERV. CO. IN CHARESTON)
7 07/12/17 LANDMARK AMERICAN INS. CO. (TO CORP. SERV. CO. IN CHARLESTON)
8 07/11/17 ALLIED WORLD INS. CO. (TO PADMINI SHAH FOR ALLIED)
9 07/12/17 LLOYDS SYNDICATE SJC (CT CORP. TO NORA DINDYAL)
10 07/14/17 AON PLC (LYNANNE GARES OF CORP. SERV. CO.)
11 07/12/17 LLOYDS SYNDICATE ATL (CT. CORP. TO NORA DINDYAL)
12 07/12/17 LLOYDS SYNDICATE BRT (CT. CORP. TO NORA DINDYAL)
13 07/12/17 LLOYDS SYNDICATE TAL (CT. CORP. TO NORA DINDYAL)
14 07/12/17 LLOYDS SYNDICATE CNP (CT. CORP. TO NOA DINDYAL)
15 07/12/17 LLOYDS SYNDICATE MKL (CT. CORP. TO NORA DINDYAL)
16 07/11/17 ENDURANCE UK SOMPO INTN'L (GENISE BRYANT)
17 07/10/17 OIL CASUALTY INS. LTD (CORP. TRUST CO. TO AMY MCLAREN)
18 07/12/17 LLOYDS SYNDICATE CHN (CT. CORP. TO NORA DINDYAL)
19 07/12/17 LIBERTY SURPLUS INS. CO. (CORP. SERV. CO. IN CHARLESTON)
20 07/25/17 ARCH INS. CO. (FRANCINE PETROSINO OF ARCH INS.)
21 07/12/17 RSUI INDEMNITY CO. (CORP. SERV. CO. IN CHARLESTON)
22 07/14/17 ASPEN SPECIALTY INS. CO. (ERICA DOUGLAS, PARALEGAL)
23 NOVAE BERMUDA UNDERWRITING LOMBARD ST.
24 07/14/17 ASPEN BERMUDA LIMITED (ERICA DOUGLAS, PARALEGAL)
25 07/12/17 LLOYDS SYNDICATE 4444 (NORA DINDYAL, CT CORP.)
26 07/12/17 IRONSHORE SPECIALTY INS. CO. (CORP. SERV. CO. IN CHARLESTON)
27 07/12/17 LLOYDS SYNDICATE MMX (NORA DINDYAL, CT CORP.)
28 07/12/17 LLOYDS SYNDICATE TMK (NORA DINDYAL, CT CORP.)
29 07/12/17 LLOYDS SYNDICATE RNR (NORA DINDYAL, CT CORP.)
30 07/12/17 LLOYDS SNYDICATE ASC (NORA DINDYAL, CT CORP.)
31 07/12/17 LLOYDS SYNDICATE HCC (NORA DINDYAL, CT CORP.)
32 07/12/17 LLOYDS SYNDICATE AFB (NORA DINDYAL, CT CORP.)
33 07/17/17 TOKIO MARINE AMERICA INS. (ED SAYAGE FOR TOKIO MARINE)
34 07/11/17 ENDURANCE AMERICAN SPECIALTY INS. (GENISE BRYANT)
35 07/13/17 RESORT HOTEL INS. SERVICES (GREGORY RICHLE FOR RESORT HOTEL)
36 07/12/17 NOVAE BERMUDA UNDERWRITING CT CORP (NORA DINDYAL, CT CORP)
37 NOVAE BERMUDA IDEATION HOUSE
38 07/03/17 DEPOSIT - BAILEY & GLASSER \$200.00
39 07/24/17 NOTICE OF APPEARANCE OF COUNSEL - LEE MURRAY HALL, ESQ. FOR
40 DEF. LIBERTY MUTUAL FIRE INS. CO. - FILED

Plaintiffs' Complaint

Cl. at Court
Greenbrier Co., W. Va.
Filed

CIVIL CASE INFORMATION STATEMENT 2017 JUN 23 PM 4:05

CIVIL CASES

IN THE CIRCUIT COURT OF GREENBRIER COUNTY, WEST VIRGINIA

**GREENBRIER HOTEL CORPORATION,
THE GREENBRIER SPORTING CLUB, INC.,
GREENBRIER SPORTING CLUB DEVELOPMENT COMPANY, INC.,
OLD WHITE CHARITIES, INC., and OAKHURST CLUB LLC,**

PLAINTIFFS,

v.

**CIVIL ACTION NO.: 17-C _____
HONORABLE: _____**

ACE AMERICAN INSURANCE COMPANY, et al.,

DEFENDANTS.

	<u>Days to Answer Answer</u>	<u>Type of Service</u>
ACE American Insurance Company Attn: Paul Beach, Esquire 436 Walnut Street WAO4K Philadelphia, PA 19106	30	Secretary of State
Liberty Mutual Fire Insurance Company Corporation Service Company 209 W. Washington Street Charleston, WV 25302	30	Secretary of State
Landmark American Insurance Company Corporation Service Company 209 W. Washington Street Charleston, WV 25302	30	Secretary of State

Allied World Insurance Company Attn: Karen Colonna 199 Water Street, 24th Floor New York, NY 10038	30	Secretary of State
Arch Insurance Company Arch Insurance Group, Inc. c/o Regan Shulman Harborside 3 210 Hudson Street, Suite 300 Jersey City, NJ 07311	30	Secretary of State
Tokio Marine America Insurance Company Attn: B. Steven Goldstein Tokio Marine Management Inc. 230 Park Ave. New York, NY 10169	30	Secretary of State
Endurance American Specialty Insurance Company Attn: Richard Appel 750 Third Avenue New York, NY 10017	30	Secretary of State
Endurance UK n/k/a Sompo International Attn: Richard Appel 750 Third Avenue New York, NY 10017	30	Secretary of State
Liberty Surplus Insurance Corporation Corporation Service Company 209 W. Washington Street Charleston, WV 25302	30	Secretary of State
RSUI Indemnity Company Corporation Service Company 209 W. Washington Street Charleston, WV 25302	30	Secretary of State
AON PLC Attn: Peter M. Lieb, General Counsel 200 East Randolph Street, 8th Floor Chicago, IL 60601	30	Secretary of State

Aspen Specialty Insurance Company 175 Capital Blvd., Suite 300 Rocky Hill, CT 06067	30	Secretary of State
Aspen Bermuda Limited 175 Capital Blvd. Rocky Hill, CT 06067	30	Secretary of State
Ironshore Specialty Insurance Company, A Liberty Mutual Company Corporation Service Company 209 W. Washington Street Charleston, WV 25302	30	Secretary of State
Lloyds Syndicate MMX CT Corporation System 111 Eighth Avenue New York, NY 10011	30	Secretary of State
Lloyds Syndicate TMK CT Corporation System 111 Eighth Avenue New York, NY 10011	30	Secretary of State
Lloyds Syndicate RNR CT Corporation System 111 Eighth Avenue New York, NY 10011	30	Secretary of State
Lloyds Syndicate ASC CT Corporation System 111 Eighth Avenue New York, NY 10011	30	Secretary of State
Lloyds Syndicate HCC CT Corporation System 111 Eighth Avenue New York, NY 10011	30	Secretary of State
Lloyds Syndicate AFB CT Corporation System 111 Eighth Avenue New York, NY 10011	30	Secretary of State

Lloyds Syndicate SJC CT Corporation System 111 Eighth Avenue New York, NY 10011	30	Secretary of State
Lloyds Syndicate ATL CT Corporation System 111 Eighth Avenue New York, NY 10011	30	Secretary of State
Lloyds Syndicate BRT CT Corporation System 111 Eighth Avenue New York, NY 10011	30	Secretary of State
Lloyds Syndicate TAL CT Corporation System 111 Eighth Avenue New York, NY 10011	30	Secretary of State
Lloyds Syndicate CNP CT Corporation System 111 Eighth Avenue New York, NY 10011	30	Secretary of State
Lloyds Syndicate MKL CT Corporation System 111 Eighth Avenue New York, NY 10011	30	Secretary of State
Lloyds Syndicate CHN CT Corporation System 111 Eighth Avenue New York, NY 10011	30	Secretary of State
Lloyds Syndicate 4444 (Sompo Canopious) CT Corporation System 111 Eighth Avenue New York, NY 10011	30	Secretary of State
Oil Casualty Insurance Ltd., Subsidiary of Ashland Global Holdings, Inc. The Corporation Trust Company Corporation Trust Center 1209 Orange Street Wilmington, DE 19801	30	Secretary of State

Novae Bermuda Underwriting Ltd. CT Corporation System 111 Eighth Avenue New York, NY 10011	30	Secretary of State
Novae Bermuda Underwriting Ltd. Ideation House 94 Pitts Bay Road Pembroke, HM08 Bermuda	30	International Service
Novae Bermuda Underwriting Ltd. 21 Lombard Street London	30	International Service

PLAINTIFF: GREENBRIER HOTEL CORPORATION; THE GREENBRIER SPORTING CLUB, INC., GREENBRIER SPORTING CLUB DEVELOPMENT COMPANY, INC.; OLD WHITE CHARITIES, INC.	CASE NUMBER:
DEFENDANTS: ACE AMERICAN INSURANCE COMPANY, LIBERTY MUTUAL FIRE INSURANCE COMPANY, LANDMARK AMERICAN INSURANCE COMPANY, ALLIED WORLD INSURANCE COMPANY, LLOYDS SYNDICATE SJC, AON PLC, LLOYDS SYNDICATE ATL, LLOYDS SYNDICATE BRT, LLOYDS SYNDICATE TAL, LLOYDS SYNDICATE CNP, LLOYDS SYNDICATE MKL, ENDURANCE UK, n/k/s SOMPRO INTERNATIONAL, OIL CASUALTY INSURANCE LTD, LLOYDS SYNDICATE CHN, LIBERTY SURPLUS INSURANCE CORPORATION, ARCH INSURANCE COMPANY, RSUI INDEMNITY COMPANY, ASPEN SPECIALTY INSURANCE COMPANY, NOVAE BERMUDA UNDERWRITING LTD, ASPEN BERMUDA LIMITED, LLOYDS SYNDICATE 4444 (SOMPO CANOPIOUS), IRONSHORE SPECIALTY INSURANCE COMPANY, LLOYDS SYNDICATE MMX, LLOYDS SYNDICATE TMK, LLOYDS SYNDICATE RNR, LLOYDS SYNDICATE ASC, LLOYDS SYNDICATE HCC, LLOYDS SYNDICATE AFB, TOKIO MARINE AMERICA INSURANCE COMPANY, and ENDURANCE AMERICAN SPECIALTY INSURANCE COMPANY	

II. TYPE OF CASE:

TORTS	OTHER CIVIL	
<input type="checkbox"/> Asbestos	<input type="checkbox"/> Adoption	<input type="checkbox"/> Appeal from Magistrate Court
<input type="checkbox"/> Professional Malpractice	<input type="checkbox"/> Contract	<input type="checkbox"/> Petition for Modification of Magistrate Sentence
<input type="checkbox"/> Personal Injury	<input type="checkbox"/> Real Property	<input type="checkbox"/> Miscellaneous Civil
<input type="checkbox"/> Product Liability	<input type="checkbox"/> Mental Health	<input type="checkbox"/> Medical Malpractice
<input checked="" type="checkbox"/> Other Tort	<input type="checkbox"/> Appeal of Administrative Agency	

III. JURY DEMAND: ☒ Yes ☐ No
CASE WILL BE READY FOR TRIAL BY (MONTH/YEAR): June 2018

IV. DO YOU OR ANY OF YOUR CLIENTS OR WITNESSES IN THIS CASE REQUIRE SPECIAL ACCOMMODATIONS DUE TO A DISABILITY OR AGE?

YES ☐ NO ☒

IF YES, PLEASE SPECIFY:

- ☐ Wheelchair accessible hearing room and other facilities
- ☐ Interpreter or other auxiliary aid for the hearing impaired
- ☐ Reader or other auxiliary aid for the visually impaired
- ☐ Spokesperson or other auxiliary aid for the speech impaired
- ☐ Other:

<i>Attorney Name:</i>	Brian A. Glasser (WVSB #6597) Gregory Y. Porter (Motion to be Submitted) Jonathan R. Marshall (WVSB #10580)	Representing: <input checked="" type="checkbox"/> Plaintiff <input type="checkbox"/> Defendant <input type="checkbox"/> Third-Party Defendant
<i>Firm Address:</i>	William Ihlenfeld, II (WVSB # 7465) Bailey & Glasser LLP	
<i>Telephone:</i>	209 Capitol Street	
<i>Facsimile:</i>	Charleston, WV 25301 304-345-6555 304-342-1110	

Dated: June 23, 2017



Signature

IN THE CIRCUIT COURT OF GREENBRIER COUNTY, WEST VIRGINIA

GREENBRIER HOTEL CORPORATION,
THE GREENBRIER SPORTING CLUB, INC.,
GREENBRIER SPORTING CLUB DEVELOPMENT COMPANY, INC.,
OLD WHITE CHARITIES, INC., and OAKHURST CLUB LLC,

PLAINTIFFS,

v.

CIVIL ACTION NO.: 17-C-_____
HONORABLE: _____

ACE AMERICAN INSURANCE COMPANY,
LIBERTY MUTUAL FIRE INSURANCE COMPANY,
LANDMARK AMERICAN INSURANCE COMPANY,
ALLIED WORLD INSURANCE COMPANY,
LLOYDS SYNDICATE SJC, AON PLC,
LLOYDS SYNDICATE ATL, LLOYDS SYNDICATE BRT,
LLOYDS SYNDICATE TAL, LLOYDS SYNDICATE CNP,
LLOYDS SYNDICATE MKL, ENDURANCE UK,
n/k/s SOMPRO INTERNATIONAL,
OIL CASUALTY INSURANCE LTD, LLOYDS SYNDICATE CHN,
LIBERTY SURPLUS INSURANCE CORPORATION,
ARCH INSURANCE COMPANY, RSUI INDEMNITY COMPANY,
ASPEN SPECIALTY INSURANCE COMPANY, NOVAE BERMUDA
UNDERWRITING LTD, ASPEN BERMUDA LIMITED,
LLOYDS SYNDICATE 4444 (SOMPO CANOPIOUS),
IRONSHORE SPECIALTY INSURANCE COMPANY,
LLOYDS SYNDICATE MMX, LLOYDS SYNDICATE TMK,
LLOYDS SYNDICATE RNR, LLOYDS SYNDICATE ASC,
LLOYDS SYNDICATE HCC, LLOYDS SYNDICATE AFB,
TOKIO MARINE AMERICA INSURANCE COMPANY, and
ENDURANCE AMERICAN SPECIALTY INSURANCE COMPANY,

DEFENDANTS.

Complaint for Declaratory Judgment

Now come Plaintiffs, for their Complaint for Declaratory Judgment, and state as follows:

Jurisdiction and Venue

1. Each Plaintiff, other than Oakhurst Club LLC and Greenbrier Sporting Club Development Company, Inc., is a West Virginia Corporation.

2. Oakhurst Club LLC is a West Virginia Limited Liability Company whose members are James C. Justice II, citizen of West Virginia, James C. Justice III, citizen of Virginia, and Jilleen L. Justice, citizen of West Virginia.

3. Greenbrier Sporting Club Development Company, Inc. is a Delaware corporation.

4. Each Defendant is an insurer of Plaintiffs under the same or related policies.

5. On information and belief, none of the Defendants are West Virginia corporations, but are licensed and authorized to do business in the State of West Virginia and, in fact, purport to have issued and sold policies of insurance naming Plaintiffs, and covering property owned by Plaintiffs, located in White Sulphur Springs, Greenbrier County, West Virginia.

6. Plaintiffs bring this action pursuant to W.Va. Code 55-13-1, et seq., and Rule 57 W. Va. R. Civ. P., seeking certain declarations with respect to the rights and obligations of the parties, but not any amount of any loss.¹

Factual Background

7. On June 23, 2016, Plaintiffs sustained damage to real and personal property from storm and flooding described as a "1000-year event".

¹Nothing herein should be taken as a waiver of the right to subsequently litigate any and

8. Each Plaintiff is an entity affiliated with a destination resort, thereby also incurring additional losses by way of Business Interruption, Extra Expense, Expense to Reduce Loss, Soft Costs, and Rental Value/Rental Income, as those terms are believed to be, and ought to be, defined and covered under the aforesaid policies of insurance.

9. Plaintiffs timely notified Defendants of claims for losses and coverage.

10. During the past year, while Plaintiffs have been trying to resolve the amounts owed by the Defendants, it has become apparent that there are inconsistencies between the Defendants' positions about covered losses and that these inconsistencies may arise from the existence of more than one policy. Despite numerous requests to the Defendants' authorized agent and adjustor, Plaintiffs have not been provided certified copies of any portion, nor the entirety, of the policy(ies) at issue, nearly a year having passed since the storm and flooding. Indeed, Plaintiffs do not even know if more than one policy exists.

11. The parties dispute putative terms and conditions of coverage which dispute is impeding valuation. Accordingly, Plaintiffs seek the entry of an Order compelling production of all insurance policies and other relief requested herein so that informal valuation can meaningfully proceed.

Stipulation

12. With respect to all Plaintiffs' claims in this Complaint, as pled, Plaintiffs and their counsel do not seek to recover an award of attorney's fees, costs, and interest on fees and costs that, in the aggregate, would exceed \$74,500 and hereby stipulate to that ceiling.

13. With respect to all Plaintiffs' claims in this Complaint, as pled, to the extent any

all issues not otherwise resolved.

award is made of attorney's fees, costs, and interest on fees and costs that, in the aggregate, exceeds \$74,500, Plaintiffs and their counsel stipulate that they are not entitled to recover the excess amount.

14. This stipulation applies regardless of the form of the remedy awarded.

15. Plaintiffs agree to be bound by this stipulation throughout the pendency of this Complaint, as pled.

Declarations Requested

WHEREFORE, Plaintiffs ask the Court to declare that:

- A) Plaintiffs, as Named Insureds are entitled to a certified copy of their policies and the same must be provided forthwith;
- B) Absent proof of pre-loss delivery of each policy, any limiting provision in such policy shall be deemed null and void as not having been made conspicuous, plain and clear;
- C) Property insurance is first party coverage and, as such, Plaintiffs are entitled to recover reasonable attorney fees incurred in seeking this relief, not to exceed the stipulated sum of \$74,500.00.

Plaintiffs
By Counsel:



Brian A. Glasser, Esq., (WV Bar No. 6597)
Jonathan R. Marshall, Esq. (WV Bar No. 10580)
William J. Ihlenfeld, II, Esq. (WV Bar No. 7465)
Bailey & Glasser LLP
209 Capitol Street
Charleston, WV 25301

Phone: (304) 345-6555

Fax: (304) 342-1110

bglasser@baileyglasser.com

jmarshall@baileyglasser.com

wihlenfeld@baileyglasser.com

Plaintiffs' First Amended Complaint

S U M M O N S

IN THE CIRCUIT COURT OF GREENBRIER COUNTY, WEST VIRGINIA

GREENBRIER HOTEL CORPORATION,
THE GREENBRIER SPORTING CLUB, INC.,
GREENBRIER SPORTING CLUB DEVELOPMENT COMPANY, INC.,
OLD WHITE CHARITIES, INC., and OAKHURST CLUB LLC,

PLAINTIFFS,

v.

CIVIL ACTION NO.: 17-C-124
HONORABLE: (B)

ACE AMERICAN INSURANCE COMPANY, et al.,

DEFENDANTS.

TO THE ABOVE-NAMED DEFENDANT:

Oil Casualty Insurance Ltd., Subsidiary of
Ashland Global Holdings, Inc.
The Corporation Trust Company
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801

IN THE NAME OF THE STATE OF WEST VIRGINIA, you are hereby summoned and required to serve upon Brian A. Glasser, Jonathan R. Marshall, William Ihlenfeld and the law firm of Bailey & Glasser LLP, whose address is 209 Capitol Street, Charleston, West Virginia 25301, an answer, including any related counterclaim you may have, to the amended complaint filed against you in the above-styled action, a true copy of which is herewith delivered to you. You are required to serve your answer **within 30 days** after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the amended complaint and you will be thereafter barred for asserting in another action any claim you may have asserted by counterclaim in the above-styled civil action.

DATED:

CLERK OF COURT:

6/29/17

Lorraine Calbrecht

Circuit Court
Greenbrier County, VA.
Filed
2017 JUN 29 AM 10:55

IN THE CIRCUIT COURT OF GREENBRIER COUNTY, WEST VIRGINIA

GREENBRIER HOTEL CORPORATION,
THE GREENBRIER SPORTING CLUB, INC.,
GREENBRIER SPORTING CLUB DEVELOPMENT COMPANY, INC.,
OLD WHITE CHARITIES, INC., and OAKHURST CLUB LLC,

PLAINTIFFS,

v.

CIVIL ACTION NO.: 17-CV-124
HONORABLE: (B)

ACE AMERICAN INSURANCE COMPANY,
LIBERTY MUTUAL FIRE INSURANCE COMPANY,
LANDMARK AMERICAN INSURANCE COMPANY,
ALLIED WORLD INSURANCE COMPANY,
LLOYDS SYNDICATE SJC, AON PLC,
LLOYDS SYNDICATE ATL, LLOYDS SYNDICATE BRT,
LLOYDS SYNDICATE TAL, LLOYDS SYNDICATE CNP,
LLOYDS SYNDICATE MKL, ENDURANCE UK,
n/k/s SOMPRO INTERNATIONAL,
OIL CASUALTY INSURANCE LTD, LLOYDS SYNDICATE CHN,
LIBERTY SURPLUS INSURANCE CORPORATION,
ARCH INSURANCE COMPANY, RSUI INDEMNITY COMPANY,
ASPEN SPECIALTY INSURANCE COMPANY, NOVAE BERMUDA
UNDERWRITING LTD, ASPEN BERMUDA LIMITED,
LLOYDS SYNDICATE 4444 (SOMPO CANOPIOUS),
IRONSHORE SPECIALTY INSURANCE COMPANY,
LLOYDS SYNDICATE MMX, LLOYDS SYNDICATE TMK,
LLOYDS SYNDICATE RNR, LLOYDS SYNDICATE ASC,
LLOYDS SYNDICATE HCC, LLOYDS SYNDICATE AFB,
TOKIO MARINE AMERICA INSURANCE COMPANY,
ENDURANCE AMERICAN SPECIALTY INSURANCE COMPANY, and
RESORT HOTEL INSURANCE SERVICES INC. d/b/a RESORT HOTEL INSURANCE
COMPANY,

DEFENDANTS.

First Amended Complaint for Declaratory Judgment

Now come Plaintiffs, for their First Amended Complaint for Declaratory Judgment, and state as follows:

Jurisdiction and Venue

1. Each Plaintiff, other than Oakhurst Club LLC and Greenbrier Sporting Club Development Company, Inc., is a West Virginia Corporation.
2. Oakhurst Club LLC is a West Virginia Limited Liability Company whose members are James C. Justice II, citizen of West Virginia, James C. Justice III, citizen of Virginia, and Jilleen L. Justice, citizen of West Virginia.
3. Greenbrier Sporting Club Development Company, Inc. is a Delaware corporation.
4. Each Defendant is an insurer of Plaintiffs under the same or related policies.
5. On information and belief, none of the Defendants are West Virginia corporations, but are licensed and authorized to do business in the State of West Virginia and, in fact, purport to have issued and sold policies of insurance naming Plaintiffs, and covering property owned by Plaintiffs, located in White Sulphur Springs, Greenbrier County, West Virginia. Defendant Resort Hotel Insurance Services, Inc. is a Virginia corporation.
6. Plaintiffs bring this action pursuant to W.Va. Code 55-13-1, et seq., and Rule 57 W. Va. R. Civ. P., seeking certain declarations with respect to the rights and obligations of the parties, but not any amount of any loss.¹

Factual Background

7. On June 23, 2016, Plaintiffs sustained damage to real and personal property from

¹Nothing herein should be taken as a waiver of the right to subsequently litigate any and

storm and flooding described as a "1000-year event".

8. Each Plaintiff is an entity affiliated with a destination resort, thereby also incurring additional losses by way of Business Interruption, Extra Expense, Expense to Reduce Loss, Soft Costs, and Rental Value/Rental Income, as those terms are believed to be, and ought to be, defined and covered under the aforesaid policies of insurance.

9. Plaintiffs timely notified Defendants of claims for losses and coverage.

10. During the past year, while Plaintiffs have been trying to resolve the amounts owed by the Defendants, it has become apparent that there are inconsistencies between the Defendants' positions about covered losses and that these inconsistencies may arise from the existence of more than one policy. Despite numerous requests to the Defendants' authorized agent and adjuster, Plaintiffs have not been provided certified copies of any portion, nor the entirety, of the policy(ies) at issue, nearly a year having passed since the storm and flooding. Indeed, Plaintiffs do not even know if more than one policy exists.

11. The parties dispute putative terms and conditions of coverage which dispute is impeding valuation. Accordingly, Plaintiffs seek the entry of an Order compelling production of all insurance policies and other relief requested herein so that informal valuation can meaningfully proceed.

Stipulation

12. With respect to all Plaintiffs' claims in this First Amended Complaint, as pled, Plaintiffs and their counsel do not seek to recover an award of attorney's fees, costs, and interest on fees and costs that, in the aggregate, would exceed \$74,500 and hereby stipulate to that

all issues not otherwise resolved.

ceiling.

13. With respect to all Plaintiffs' claims in this First Amended Complaint, as pled, to the extent any award is made of attorney's fees, costs, and interest on fees and costs that, in the aggregate, exceeds \$74,500, Plaintiffs and their counsel stipulate that they are not entitled to recover the excess amount.

14. This stipulation applies regardless of the form of the remedy awarded.


15. Plaintiffs agree to be bound by this stipulation throughout the pendency of this First Amended Complaint, as pled.

Declarations Requested

WHEREFORE, Plaintiffs ask the Court to declare that:

- A) Plaintiffs, as Named Insureds are entitled to a certified copy of their policies and the same must be provided forthwith;
- B) Absent proof of pre-loss delivery of each policy, any limiting provision in such policy shall be deemed null and void as not having been made conspicuous, plain and clear;
- C) Property insurance is first party coverage and, as such, Plaintiffs are entitled to recover reasonable attorney fees incurred in seeking this relief, not to exceed the stipulated sum of \$74,500.00.

Plaintiffs
By Counsel:


Brian A. Glasser, Esq. (WV Bar No. 6597)
Jonathan R. Marshall, Esq. (WV Bar No. 10580)
William J. Ihlenfeld, II, Esq. (WV Bar No. 7465)
Bailey & Glasser LLP

209 Capitol Street
Charleston, WV 25301
Phone: (304) 345-6555
Fax: (304) 342-1110
bglasser@baileyglasser.com
marshall@baileyglasser.com
wihlfeld@baileyglasser.com

Returns of Service

IN THE CIRCUIT COURT OF GREENBRIER COUNTY, WEST VIRGINIA

GREENBRIER HOTEL CORPORATION,
THE GREENBRIER SPORTING CLUB, INC.,
GREENBRIER SPORTING CLUB DEVELOPMENT
COMPANY, INC., OLD WHITE CHARITIES, INC.,
and OAKHURST CLUB, LLC,

Plaintiff,

v.

C.A. No. 17-c-124

ACE AMERICAN INSURANCE COMPANY, et al.,

Defendants.

AFFIDAVIT OF SERVICE

I, Chad Toscano, being duly sworn and deposed in the County of New Castle, State of Delaware, states:

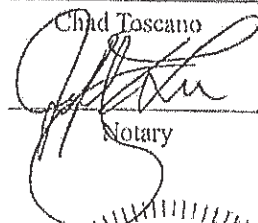
I am over eighteen years of age. I am employed by DLSDiscovery, LLC. I am not a party to this action.

On July 10, 2017, I served a true and correct copy of the following document(s):

- Summons
- First Amended Complaint For Declaratory Judgement

on Don Hunter of ACE American Insurance Company, 436 Walnut St, Philadelphia, PA 19106.


July 10, 2017


Chad Toscano
Notary



IN THE CIRCUIT COURT OF GREENBRIER COUNTY, WEST VIRGINIA

GREENBRIER HOTEL CORPORATION,
THE GREENBRIER SPORTING CLUB, INC.,
GREENBRIER SPORTING CLUB
DEVELOPMENT COMPANY, INC.,
OLD WHITE CHARITIES, INC.,
and OAKHURST CLUB LLC,

PLAINTIFFS,

v.

CIVIL ACTION NO.: 17-C-124

ACE AMERICAN INSURANCE COMPANY, et al.

DEFENDANTS.

AFFIDAVIT OF SERVICE

I, Michael Kessinger, state as follows: I am over eighteen years of age. I am not a party to this action. I served a true and correct copy of the summons and First Amended Complaint for Declaratory Judgment upon Liberty Mutual Fire Insurance Company by delivery to its Registered Agent: Corporation Service Company, 209 W. Washington Street, Charleston, WV 25302 on the 12th day of July, 2017.

7/12/2017
Date

[Signature]
Name

IN THE CIRCUIT COURT OF GREENBRIER COUNTY, WEST VIRGINIA

GREENBRIER HOTEL CORPORATION,
THE GREENBRIER SPORTING CLUB, INC.,
GREENBRIER SPORTING CLUB
DEVELOPMENT COMPANY, INC.,
OLD WHITE CHARITIES, INC.,
and OAKHURST CLUB LLC,

PLAINTIFFS,

v.

CIVIL ACTION NO.: 17-C-124


ACE AMERICAN INSURANCE COMPANY, et al.

DEFENDANTS.

AFFIDAVIT OF SERVICE

I, Michael Kessinger, state as follows: I am over eighteen years of age. I am not a party to this action. I served a true and correct copy of the summons and First Amended Complaint for Declaratory Judgment upon Landmark American Insurance Company by delivery to its Registered Agent: Corporation Service Company, 209 W. Washington Street, Charleston, WV 25302 on the 10th day of July, 2017.

7/12/17
Date


Name

COUNTY OF GREENBRIER

GREENBRIER HOTEL CORPORATION ET AL

Index #: 17 C 124

Plaintiff(s)

- against -

Date Filed:

ACE AMERICAN INSURANCE COMPANY ET AL

Defendant(s)

AFFIDAVIT OF SERVICE

STATE OF NEW YORK: COUNTY OF NEW YORK ss:

SIEH CLARK BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION, OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.

That on July 11, 2017 at 02:24 PM at

ATTN KAREN COLONNA
199 WATER ST 24TH FLOOR
NEW YORK, NY10038



deponent served the within true copy of the SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT on ALLIED WORLD INSURANCE COMPANY, the defendant/respondent therein named,


CORPORATION by delivering thereat a true copy of each to PADMINI SHAH personally, deponent knew said corporation so served to be the corporation described in said SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT as said defendant/respondent and knew said individual to be LEGAL CLERK thereof.

Deponent further states that he describes the person actually served as follows:

Sex	Skin Color	Hair Color	Age (Approx.)	Height (Approx.)	Weight (Approx.)
FEMALE	TAN	BROWN	50	5'9	230

Sworn to me on: July 11, 2017

Linda Forman
Notary Public, State of New York
No. 01FO5031305
Qualified in New York County
Commission Expires August 1, 2018


Robin Forman
Notary Public, State of New York
No. 01FO6125415
Qualified in New York County
Commission Expires April 18, 2021

Gotham Process Inc.
299 Broadway
New York NY 10007



SIEH CLARK

License #: 1187234

Docket #: *1034262*

GREENBRIER HOTEL CORPORATION ET AL

Index #: 17 C 124

Plaintiff(s)

- against -

Date Filed:

ACE AMERICAN INSURANCE COMPANY ET AL

Defendant(s)

AFFIDAVIT OF SERVICE

STATE OF NEW YORK: COUNTY OF NEW YORK ss:

DANIEL KNIGHT BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION, OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.

That on July 25, 2017 at 02:54 PM at

ARCH INSURANCE GROUP, INC.
C/O REGAN SHULMAN
210 HUDSON STREET SUITE 300
JERSEY CITY, NJ07311


deponent served the within true copy of the SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT on ARCH INSURANCE COMPANY, the defendant/respondent therein named,

CORPORATION by delivering thereat a true copy of each to FRANCINE PETROSINO (LEGAL DEPT) personally, deponent knew said corporation so served to be the corporation described in said SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT as said defendant/respondent and knew said individual to be AUTHORIZED to accept thereof.

Deponent further states that he describes the person actually served as follows:

Sex	Skin Color	Hair Color	Age (Approx.)	Height (Approx.)	Weight (Approx.)
FEMALE	WHITE	BROWN	48	5'5	145

Sworn to me on: July 25, 2017

Linda Forman
Notary Public, State of New York
No. 01FO5031305
Qualified in New York County
Commission Expires August 1, 2018

Robin Forman
Notary Public, State of New York
No. 01FO6125415
Qualified in New York County
Commission Expires April 18, 2018
Gotham Process Inc
299 Broadway
New York NY 10007

DANIEL KNIGHT

Docket #: *1034235*

COUNTY OF GREENBRIER

GREENBRIER HOTEL CORPORATION ET AL

Index #: 17 C 124

Plaintiff(s)

- against -

Date Filed:

ACE AMERICAN INSURANCE COMPANY ET AL

Defendant(s)

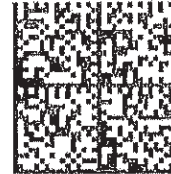
AFFIDAVIT OF SERVICE

STATE OF NEW YORK: COUNTY OF NEW YORK ss:

KELVI A FRIAS BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION, OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.

That on July 17, 2017 at 02:14 PM at

TOKIO MARINE AMERICA
1221 AVENUE OF THE AMERICAS, SUITE 1500
NEW YORK, NY10020



deponent served the within true copy of the SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT on TOKIO MARINE AMERICA INSURANCE COMPANY, the defendant/respondent therein named,

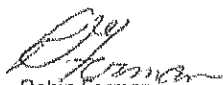
CORPORATION by delivering thereat a true copy of each to ED SAYAGE personally, deponent knew said corporation so served to be the corporation described in said SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT as said defendant/respondent and knew said individual to be AUTHORIZED to accept thereof.

Deponent further states that he describes the person actually served as follows:

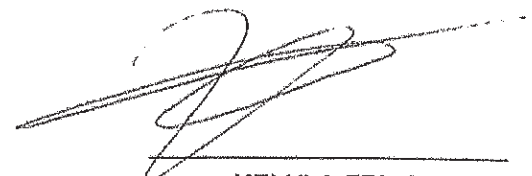
Sex	Skin Color	Hair Color	Age (Approx.)	Height (Approx.)	Weight (Approx)
MALE	WHITE	BLACK	40	6'2	220

Sworn to me on: July 17, 2017

Linda Forman
Notary Public, State of New York
No. 01FO5031305
Qualified in New York County
Commission Expires August 1, 2018


Robin Forman
Notary Public, State of New York
No. 01FO6125415
Qualified in New York County
Commission Expires April 18, 2021

Gotham Process Inc.
299 Broadway
New York NY 10007



KELVI A FRIAS

License #: 1232446

Docket #: *1034589*

COUNTY OF GREENBRIER

GREENBRIER HOTEL CORPORATION ET AL

Index #: 17 C 124

Plaintiff(s)

- against -

Date Filed:

ACE AMERICAN INSURANCE COMPANY ET AL

Defendant(s)

AFFIDAVIT OF SERVICE

STATE OF NEW YORK: COUNTY OF NEW YORK ss:

ANDRE MEISEL BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION, OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.

That on July 11, 2017 at 01:57 PM at

ATTN RICHARD APPEL
750 THIRD AVE
NEW YORK, NY10017



deponent served the within true copy of the SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT on ENDURANCE AMERICAN SPECIALTY INSURANCE COMPANY, the defendant/respondent therein named,

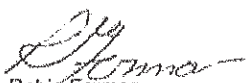
CORPORATION by delivering thereat a true copy of each to GENISE BRYANT personally, deponent knew said corporation so served to be the corporation described in said SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT as said defendant/respondent and knew said individual to be GENERAL AGENT thereof.

Deponent further states that he describes the person actually served as follows:

Sex	Skin Color	Hair Color	Age (Approx.)	Height (Approx.)	Weight (Approx)
FEMALE	BLACK	BLACK	40	5'5	150

Sworn to me on: July 11, 2017

Linda Forman
Notary Public, State of New York
No. 01FO5031305
Qualified in New York County
Commission Expires August 1, 2018


Robin Forman
Notary Public, State of New York
No. 01FO6125415
Qualified in New York County
Commission Expires April 18, 2021

Gotham Process Inc.
299 Broadway
New York NY 10007



ANDRE MEISEL

License #: 1372356

Docket #: *1034261*

COUNTY OF GREENBRIER

GREENBRIER HOTEL CORPORATION ET AL

Index #: 17 C 124

Plaintiff(s)

- against -

Date Filed:

ACE AMERICAN INSURANCE COMPANY ET AL

Defendant(s)

AFFIDAVIT OF SERVICE

STATE OF NEW YORK: COUNTY OF NEW YORK ss:

ANDRE MEISEL BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION, OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.

That on July 11, 2017 at 01:57 PM at

ATTN RICHARD APPEL
750 THIRD AVE
NEW YORK, NY10017



deponent served the within true copy of the SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT on ENDURANCE UK N/K/A SOMPO INTERNATIONAL, the defendant/respondent therein named,

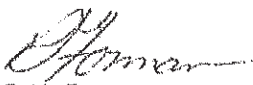
CORPORATION by delivering thereat a true copy of each to GENISE BRYANT personally, deponent knew said corporation so served to be the corporation described in said SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT as said defendant/respondent and knew said individual to be GENERAL AGENT thereof.

Deponent further states that he describes the person actually served as follows:

Sex	Skin Color	Hair Color	Age (Approx.)	Height (Approx.)	Weight (Approx)
FEMALE	BLACK	BLACK	40	5'5	150

Sworn to me on: July 11, 2017

Linda Forman
Notary Public, State of New York
No. 01FO5031305
Qualified in New York County
Commission Expires August 1, 2018


Robin Forman
Notary Public, State of New York
No. 01FO6125415
Qualified in New York County
Commission Expires April 18,
2021

Gotham Process Inc.
299 Broadway
New York NY 10007


ANDRE MEISEL

License #: 1372356

Docket #: *1034260*

IN THE CIRCUIT COURT OF GREENBRIER COUNTY, WEST VIRGINIA

GREENBRIER HOTEL CORPORATION,
THE GREENBRIER SPORTING CLUB, INC.,
GREENBRIER SPORTING CLUB
DEVELOPMENT COMPANY, INC.,
OLD WHITE CHARITIES, INC.,
and OAKHURST CLUB LLC,

PLAINTIFFS,

v.

CIVIL ACTION NO.: 17-C-124

ACE AMERICAN INSURANCE COMPANY, et al.

DEFENDANTS.

AFFIDAVIT OF SERVICE

I, Michael Kessinger, state as follows: I am over eighteen years of age. I am not a party to this action. I served a true and correct copy of the summons and First Amended Complaint for Declaratory Judgment upon Liberty Surplus Insurance Corporation by delivery to its Registered Agent: Corporation Service Company, 209 W. Washington Street, Charleston, WV 25302 on the 12th day of July, 2017.

7/12/17
Date

[Signature]
Name

IN THE CIRCUIT COURT OF GREENBRIER COUNTY, WEST VIRGINIA

GREENBRIER HOTEL CORPORATION,
THE GREENBRIER SPORTING CLUB, INC.,
GREENBRIER SPORTING CLUB
DEVELOPMENT COMPANY, INC.,
OLD WHITE CHARITIES, INC.,
and OAKHURST CLUB LLC,

PLAINTIFFS,

v.

CIVIL ACTION NO.: 17-C-124

ACE AMERICAN INSURANCE COMPANY, et al.

DEFENDANTS.

AFFIDAVIT OF SERVICE

I, Michael Kessinger, state as follows: I am over eighteen years of age. I am not a party to this action. I served a true and correct copy of the summons and First Amended Complaint for Declaratory Judgment upon RSUI Indemnity Company by delivery to its Registered Agent: Corporation Service Company, 209 W. Washington Street, Charleston, WV 25302 on the 12th day of July, 2017.

7/12/2017
Date


Name

IN THE CIRCUIT COURT OF GREENBRIER COUNTY, WEST VIRGINIA

GREENBRIER HOTEL CORPORATION,
THE GREENBRIER SPORTING CLUB, INC.,
GREENBRIER SPORTING CLUB DEVELOPMENT
COMPANY, INC., OLD WHITE CHARITIES, INC.,
and OAKHURST CLUB, LLC,

Plaintiff,

v.

C.A. No. 17-c-124

ACE AMERICAN INSURANCE COMPANY, et al.,

Defendants.

AFFIDAVIT OF SERVICE

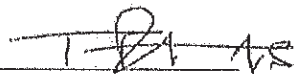
I, Tim Rhoads, being duly sworn and deposed in the County of New Castle, State of Delaware, states:

I am over eighteen years of age. I am employed by DLSDiscovery, LLC. I am not a party to this action.


On July 14, 2017, I served a true and correct copy of the following document(s):

- Summons
- First Amended Complaint For Declaratory Judgement

on AON PLC, by serving its registered agent Lynanne Gares of Corporation Service Company, 251 Little Falls Drive, Suite 400, Wilmington, DE 19808.



Tim Rhoads



Notary

July 14, 2017



STATE OF WEST VIRGINIA, CIRCUIT COURT
OF GREENBRIAR COUNTY

AFFIDAVIT OF SERVICE



184880

Index no : 17 C-124

Greenbriar Hotel Corporation, et al

Plaintiff(s),

vs.

ACE American Insurance Company, et al

Defendant(s).

STATE OF CONNECTICUT

ss: East Hartford

HARTFORD COUNTY

Sandra Yade, the undersigned, being duly sworn, deposes and says that I was at the time of service over the age of eighteen and not a party to this action. I reside in the State of Connecticut.

On 07/14/2017 at 3:02 PM, I served the within Summons and First Amended Complaint for Declaratory Judgement on Aspen Specialty Insurance Company at 175 Capital Blvd, Ste 300, Rocky Hill, CT 06067 in the manner indicated below:

CORPORATE SERVICE: By delivering a true copy of each to Erica Douglas, Paralegal of the above named corporation. The undersigned asked the recipient if he/she is authorized to accept service on behalf of Aspen Specialty Insurance Company, and the recipient responded in the affirmative.

A description of the Recipient, or other person served on behalf of the Recipient is as follows:

Sex	Color of skin/race	Color of hair	Age	Height	Weight
Female	Caucasian	Blonde	30	5'7"	120
Other Features:					

Sworn to and subscribed before me on
July 18, 2017
by an affiant who is personally known to
me or produced identification.

Amy J. Chantry
NOTARY PUBLIC

My Commission Expires 8/31/2018

X *Sandra Yade*
Sandra Yade
Same Day Process Service, Inc.
1413 K St. NW, 7th Floor
Washington, DC 20005
202 398-4200
Atty File#

AMY J. CHANTRY
NOTARY PUBLIC
MY COMMISSION EXPIRES

STATE OF WEST VIRGINIA, CIRCUIT COURT
OF GREENBRIAR COUNTY

AFFIDAVIT OF SERVICE



184881

Index no : 17 C-124

Greenbriar Hotel Corporation, et al

Plaintiff(s),

vs.

ACE American Insurance Company, et al

Defendant(s).

STATE OF CONNECTICUT

ss: East Hartford

HARTFORD COUNTY

Sandra Yade, the undersigned, being duly sworn, deposes and says that I was at the time of service over the age of eighteen and not a party to this action. I reside in the State of Connecticut.

On 07/14/2017 at 3:02 PM, I served the within Summons and First Amended Complaint for Declaratory Judgement on Aspen Bermuda Limited at 175 Capital Blvd, Ste 300, Rocky Hill, CT 06067 in the manner indicated below:

CORPORATE SERVICE: By delivering a true copy of each to Erica Douglas, Paralegal of the above named corporation. The undersigned asked the recipient if he/she is authorized to accept service on behalf of Aspen Bermuda Limited, and the recipient responded in the affirmative.

A description of the Recipient, or other person served on behalf of the Recipient is as follows:

Sex	Color of skin/race	Color of hair	Age	Height	Weight
Female	Caucasian	Blonde	30	5'7"	120
Other Features:					

Sworn to and subscribed before me on
July 18, 2017
by an affiant who is personally known to
me or produced identification.

Amy Chantry
NOTARY PUBLIC
My Commission Expires: 08/31/2018

X *Sandra Yade*
Sandra Yade
Same Day Process Service, Inc.
1413 K St. NW, 7th Floor
Washington, DC 20005
202 398-4200
Atty File#:

AMY J. CHANTRY
NOTARY PUBLIC
MY COMMISSION EXPIRES

IN THE CIRCUIT COURT OF GREENBRIER COUNTY, WEST VIRGINIA

GREENBRIER HOTEL CORPORATION,
THE GREENBRIER SPORTING CLUB, INC.,
GREENBRIER SPORTING CLUB
DEVELOPMENT COMPANY, INC.,
OLD WHITE CHARITIES, INC.,
and OAKHURST CLUB LLC,

PLAINTIFFS,

v.

CIVIL ACTION NO.: 17-C-124


ACE AMERICAN INSURANCE COMPANY, et al.

DEFENDANTS.

AFFIDAVIT OF SERVICE

I, Michael Kessinger, state as follows: I am over eighteen years of age. I am not a party to this action. I served a true and correct copy of the summons and First Amended Complaint for Declaratory Judgment upon Ironshore Specialty Insurance Company by delivery to its Registered Agent: Corporation Service Company, 209 W. Washington Street, Charleston, WV 25302 on the 12th day of July 2017.

7/12/2017
Date


Name

COUNTY OF GREENBRIER

GREENBRIER HOTEL CORPORATION ET AL

Index #: 17 C 124

Plaintiff(s)

- against -

Date Filed:

ACE AMERICAN INSURANCE COMPANY ET AL

Defendant(s)

AFFIDAVIT OF SERVICE

STATE OF NEW YORK: COUNTY OF NEW YORK ss:

LARRY YEE BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION, OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.

That on July 12, 2017 at 11:08 AM at

BY CT CORPORATION SYSTEM
111 8TH AVENUE
NEW YORK, NY10011



deponent served the within true copy of the SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT on LLOYDS SYNDICATE MMX, the defendant/respondent therein named,

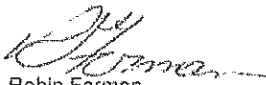
CORPORATION by delivering thereat a true copy of each to NORA DINDYAL personally, deponent knew said corporation so served to be the corporation described in said SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT as said defendant/respondent and knew said individual to be AUTHORIZED to accept thereof.

Deponent further states that he describes the person actually served as follows:

Sex	Skin Color	Hair Color	Age (Approx.)	Height (Approx.)	Weight (Approx)
FEMALE	BROWN	BLACK	55	5'4	110
GLASSES					

Sworn to me on: July 12, 2017

Linda Forman
Notary Public, State of New York
No. 01FO5031305
Qualified in New York County
Commission Expires August 1, 2018


Robin Forman
Notary Public, State of New York
No. 01FO6125415
Qualified in New York County
Commission Expires April 18, 2021

Gotham Process Inc.
299 Broadway
New York NY 10007


LARRY YEE

License #: 1159230

Docket #: *1034249*

COUNTY OF GREENBRIER

GREENBRIER HOTEL CORPORATION ET AL

Index #: 17 C 124

Plaintiff(s)

- against -

Date Filed:

ACE AMERICAN INSURANCE COMPANY ET AL

Defendant(s)

AFFIDAVIT OF SERVICE

STATE OF NEW YORK: COUNTY OF NEW YORK ss:

LARRY YEE BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION, OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.

That on July 12, 2017 at 11:08 AM at

BY CT CORPORATION SYSTEM
111 8TH AVENUE
NEW YORK, NY10011



deponent served the within true copy of the SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT on LLOYDS SYNDICATE TMK, the defendant/respondent therein named,

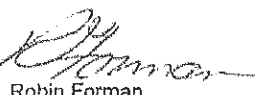
CORPORATION by delivering thereat a true copy of each to NORA DINDYAL personally, deponent knew said corporation so served to be the corporation described in said SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT as said defendant/respondent and knew said individual to be AUTHORIZED to accept thereof.

Deponent further states that he describes the person actually served as follows:

Sex	Skin Color	Hair Color	Age (Approx.)	Height (Approx.)	Weight (Approx)
FEMALE	BROWN	BLACK	55	5'4	110
GLASSES					

Sworn to me on: July 12, 2017

Linda Forman
Notary Public, State of New York
No. 01FO5031305
Qualified in New York County
Commission Expires August 1, 2018


Robin Forman
Notary Public, State of New York
No. 01FO6125415
Qualified in New York County
Commission Expires April 18,
2021

Gotham Process Inc.
299 Broadway
New York NY 10007


LARRY YEE

License #: 1159230

Docket #: *1034242*

COUNTY OF GREENBRIER

GREENBRIER HOTEL CORPORATION ET AL

Index #: 17 C 124

Plaintiff(s)

- against -

Date Filed:

ACE AMERICAN INSURANCE COMPANY ET AL

Defendant(s)

AFFIDAVIT OF SERVICE

STATE OF NEW YORK: COUNTY OF NEW YORK ss:

LARRY YEE BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION, OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.

That on July 12, 2017 at 11:08 AM at

BY CT CORPORATION SYSTEM
111 8TH AVENUE
NEW YORK, NY10011



deponent served the within true copy of the SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT on LLOYDS SYNDICATE RNR, the defendant/respondent therein named,

CORPORATION by delivering thereat a true copy of each to NORA DINDYAL personally, deponent knew said corporation so served to be the corporation described in said SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT as said defendant/respondent and knew said individual to be AUTHORIZED to accept thereof

Deponent further states that he describes the person actually served as follows:

Sex	Skin Color	Hair Color	Age (Approx.)	Height (Approx.)	Weight (Approx)
FEMALE	BROWN	BLACK	55	5'4	110
GLASSES					

Sworn to me on: July 12, 2017

Linda Forman
Notary Public, State of New York
No. 01FO5031305
Qualified in New York County
Commission Expires August 1, 2018

Robin Forman
Notary Public, State of New York
No. 01FO6125415
Qualified in New York County
Commission Expires April 18, 2021

Gotham Process Inc.
299 Broadway
New York NY 10007

LARRY YEE

License #: 1159230

Docket #: *1034247*

COUNTY OF GREENBRIER

GREENBRIER HOTEL CORPORATION ET AL

Index #: 17 C 124

Plaintiff(s)

- against -

Date Filed:

ACE AMERICAN INSURANCE COMPANY ET AL

Defendant(s)

AFFIDAVIT OF SERVICE

STATE OF NEW YORK: COUNTY OF NEW YORK ss:

LARRY YEE BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION, OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.

That on July 12, 2017 at 11:08 AM at



BY CT CORPORATION SYSTEM
111 8TH AVENUE
NEW YORK, NY 10011

deponent served the within true copy of the SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT on LLOYDS SYNDICATE ASC, the defendant/respondent therein named,

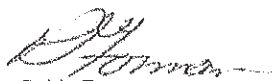
CORPORATION by delivering thereat a true copy of each to NORA DINDYAL personally, deponent knew said corporation so served to be the corporation described in said SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT as said defendant/respondent and knew said individual to be AUTHORIZED to accept thereof.

Deponent further states that he describes the person actually served as follows:


<u>Sex</u>	<u>Skin Color</u>	<u>Hair Color</u>	<u>Age (Approx.)</u>	<u>Height (Approx.)</u>	<u>Weight (Approx)</u>
<u>FEMALE</u>	<u>BROWN</u>	<u>BLACK</u>	<u>55</u>	<u>5'4</u>	<u>110</u>
<u>GLASSES</u>					

Sworn to me on: July 12, 2017

Linda Forman
Notary Public, State of New York
No. 01FO5031305
Qualified in New York County
Commission Expires August 1, 2018


Robin Forman
Notary Public, State of New York
No. 01FO6125415
Qualified in New York County
Commission Expires April 18, 2021

Gotham Process Inc.
299 Broadway
New York NY 10007


LARRY YEE
License #: 1159230
Docket #: *1034256*

COUNTY OF GREENBRIER

GREENBRIER HOTEL CORPORATION ET AL

Index #: 17 C 124

Plaintiff(s)

- against -

Date Filed:

ACE AMERICAN INSURANCE COMPANY ET AL

Defendant(s)

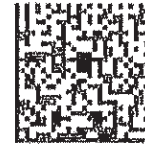
AFFIDAVIT OF SERVICE

STATE OF NEW YORK: COUNTY OF NEW YORK ss:

LARRY YEE BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION, OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.

That on July 12, 2017 at 11:08 AM at

BY CT CORPORATION SYSTEM
111 8TH AVENUE
NEW YORK, NY10011



deponent served the within true copy of the SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT on LLOYDS SYNDICATE HCC, the defendant/respondent therein named,

CORPORATION by delivering thereat a true copy of each to NORA DINDYAL personally, deponent knew said corporation so served to be the corporation described in said SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT as said defendant/respondent and knew said individual to be AUTHORIZED to accept thereof.

Deponent further states that he describes the person actually served as follows:

Sex	Skin Color	Hair Color	Age (Approx.)	Height (Approx.)	Weight (Approx)
FEMALE	BROWN	BLACK	55	5'4	110
GLASSES					

Sworn to me on: July 12, 2017

Linda Forman
Notary Public, State of New York
No. 01FO5031305
Qualified in New York County
Commission Expires August 1, 2018

[Signature]
Robin Forman
Notary Public, State of New York
No. 01FO6125415
Qualified in New York County
Commission Expires April 18,
2021

Gotham Process Inc.
299 Broadway
New York NY 10007

[Signature]
LARRY YEE

License #: 1159230

Docket #: *1034251*

COUNTY OF GREENBRIER

GREENBRIER HOTEL CORPORATION ET AL

Index #: 17 C 124

Plaintiff(s)

- against -

Date Filed:

ACE AMERICAN INSURANCE COMPANY ET AL

Defendant(s)

AFFIDAVIT OF SERVICE

STATE OF NEW YORK: COUNTY OF NEW YORK ss:

LARRY YEE BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION, OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.

That on July 12, 2017 at 11:08 AM at

BY CT CORPORATION SYSTEM
111 8TH AVENUE
NEW YORK, NY10011



deponent served the within true copy of the SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT on LLOYDS SYNDICATE AFB, the defendant/respondent therein named,

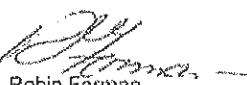
CORPORATION by delivering thereat a true copy of each to NORA DINDYAL personally, deponent knew said corporation so served to be the corporation described in said SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT as said defendant/respondent and knew said individual to be AUTHORIZED to accept thereof.

Deponent further states that he describes the person actually served as follows:

Sex	Skin Color	Hair Color	Age (Approx.)	Height (Approx.)	Weight (Approx)
FEMALE	BROWN	BLACK	55	5'4	110
GLASSES					

Sworn to me on: July 12, 2017

Linda Forman
Notary Public, State of New York
No. 01FO5031305
Qualified in New York County
Commission Expires August 1, 2018


Robin Forman
Notary Public, State of New York
No. 01FO6125415
Qualified in New York County
Commission Expires April 18, 2021

Gotham Process Inc
299 Broadway
New York NY 10007


LARRY YEE

License #: 1159230

Docket #: *1034257*

COUNTY OF GREENBRIER

GREENBRIER HOTEL CORPORATION ET AL

Index #: 17 C 124

Plaintiff(s)

- against -

Date Filed:

ACE AMERICAN INSURANCE COMPANY ET AL

Defendant(s)

AFFIDAVIT OF SERVICE

STATE OF NEW YORK: COUNTY OF NEW YORK ss:

LARRY YEE BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION, OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.

That on July 12, 2017 at 11:08 AM at

BY CT CORPORATION SYSTEM
111 8TH AVENUE
NEW YORK, NY10011



deponent served the within true copy of the SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT on LLOYDS SYNDICATE SJC, the defendant/respondent therein named,

CORPORATION by delivering thereat a true copy of each to NORA DINDYAL personally, deponent knew said corporation so served to be the corporation described in said SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT as said defendant/respondent and knew said individual to be AUTHORIZED to accept thereof.

Deponent further states that he describes the person actually served as follows:

Sex	Skin Color	Hair Color	Age (Approx.)	Height (Approx.)	Weight (Approx)
FEMALE	BROWN	BLACK	55	5'4	110
GLASSES					

Sworn to me on: July 12, 2017

Linda Forman
Notary Public, State of New York
No. 01FO5031305
Qualified in New York County
Commission Expires August 1, 2018

Robin Forman
Notary Public, State of New York
No. 01FO6125415
Qualified in New York County
Commission Expires April 18, 2021

Gotham Process Inc.
299 Broadway
New York NY 10007

LARRY YEE

License #: 1159230

Docket #: *1034246*

COUNTY OF GREENBRIER

GREENBRIER HOTEL CORPORATION ET AL

Index #: 17 C 124

Plaintiff(s)

- against -

Date Filed:

ACE AMERICAN INSURANCE COMPANY ET AL

Defendant(s)

AFFIDAVIT OF SERVICE

STATE OF NEW YORK: COUNTY OF NEW YORK ss:

LARRY YEE BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION, OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.

That on July 12, 2017 at 11:08 AM at

BY CT CORPORATION SYSTEM
111 8TH AVENUE
NEW YORK, NY10011



deponent served the within true copy of the SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT on LLOYDS SYNDICATE ATL, the defendant/respondent therein named,

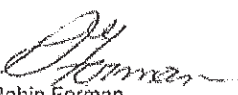
CORPORATION by delivering thereat a true copy of each to NORA DINDYAL personally, deponent knew said corporation so served to be the corporation described in said SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT as said defendant/respondent and knew said individual to be AUTHORIZED to accept thereof.

Deponent further states that he describes the person actually served as follows:

Sex	Skin Color	Hair Color	Age (Approx.)	Height (Approx.)	Weight (Approx)
FEMALE	BROWN	BLACK	55	5'4	110
GLASSES					

Sworn to me on: July 12, 2017

Linda Forman
Notary Public, State of New York
No. 01FO5031305
Qualified in New York County
Commission Expires August 1, 2018


Robin Forman
Notary Public, State of New York
No. 01FO6125415
Qualified in New York County
Commission Expires April 18, 2021

Gotham Process Inc.
299 Broadway
New York NY 10007


LARRY YEE

License #: 1159230

Docket #: *1034255*

COUNTY OF GREENBRIER

GREENBRIER HOTEL CORPORATION ET AL

Index #: 17 C 124

Plaintiff(s)

- against -

Date Filed:

ACE AMERICAN INSURANCE COMPANY ET AL

Defendant(s)

AFFIDAVIT OF SERVICE

STATE OF NEW YORK: COUNTY OF NEW YORK ss:

LARRY YEE BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION, OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.

That on July 12, 2017 at 11:08 AM at

BY CT CORPORATION SYSTEM
111 8TH AVENUE
NEW YORK, NY10011



deponent served the within true copy of the SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT on LLOYDS SYNDICATE BRT, the defendant/respondent therein named,

CORPORATION by delivering thereat a true copy of each to NORA DINDYAL personally, deponent knew said corporation so served to be the corporation described in said SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT as said defendant/respondent and knew said individual to be AUTHORIZED to accept thereof.

Deponent further states that he describes the person actually served as follows:

Sex	Skin Color	Hair Color	Age (Approx.)	Height (Approx.)	Weight (Approx)
FEMALE	BROWN	BLACK	55	5'4	110
GLASSES					

Sworn to me on: July 12, 2017

Linda Forman
Notary Public, State of New York
No. 01FO5031305
Qualified in New York County
Commission Expires August 1, 2018

Robin Forman
Robin Forman
Notary Public, State of New York
No. 01FO6125415
Qualified in New York County
Commission Expires April 18, 2021

Gotham Process Inc.
299 Broadway
New York NY 10007

LARRY YEE

License #: 1159230

Docket #: *1034254*

GREENBRIER HOTEL CORPORATION ET AL

Index #: 17 C 124

Plaintiff(s)

- against -

Date Filed:

ACE AMERICAN INSURANCE COMPANY ET AL

Defendant(s)

AFFIDAVIT OF SERVICE

STATE OF NEW YORK: COUNTY OF NEW YORK ss:

LARRY YEE BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A
PARTY TO THIS ACTION, OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN
THE STATE OF NEW YORK.

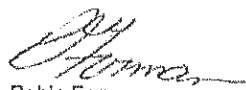
That on July 12, 2017 at 11:08 AM at

BY CT CORPORATION SYSTEM
111 8TH AVENUE
NEW YORK, NY10011deponent served the within true copy of the SUMMONS & FIRST AMENDED
COMPLAINT FOR DECLARATORY COMPLAINT on LLOYDS SYNDICATE TAL, the
defendant/respondent therein named,**CORPORATION** by delivering thereat a true copy of each to NORA DINDYAL personally, deponent knew said corporation so served
to be the corporation described in said SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY
COMPLAINT as said defendant/respondent and knew said individual to be AUTHORIZED to accept thereof.

Deponent further states that he describes the person actually served as follows:

<u>Sex</u>	<u>Skin Color</u>	<u>Hair Color</u>	<u>Age (Approx.)</u>	<u>Height (Approx.)</u>	<u>Weight (Approx)</u>
<u>FEMALE</u>	<u>BROWN</u>	<u>BLACK</u>	<u>55</u>	<u>5'4</u>	<u>110</u>
<u>GLASSES</u>					

Sworn to me on: July 12, 2017

Linda Forman
Notary Public, State of New York
No. 01FO5031305
Qualified in New York County
Commission Expires August 1, 2018

Robin Forman
Notary Public, State of New York
No. 01FO6125415
Qualified in New York County
Commission Expires April 18,
2021
Gotham Process Inc.
299 Broadway
New York NY 10007

LARRY YEE

License #: 1159230

Docket #: *1034244*

COUNTY OF GREENBRIER

GREENBRIER HOTEL CORPORATION ET AL

Index #: 17 C 124

Plaintiff(s)

- against -

Date Filed:

ACE AMERICAN INSURANCE COMPANY ET AL

Defendant(s)

AFFIDAVIT OF SERVICE

STATE OF NEW YORK: COUNTY OF NEW YORK ss:

LARRY YEE BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION, OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.

That on July 12, 2017 at 11:08 AM at

BY CT CORPORATION SYSTEM
111 8TH AVENUE
NEW YORK, NY10011



deponent served the within true copy of the SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT on LLOYDS SYNDICATE CNP, the defendant/respondent therein named,

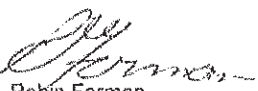
CORPORATION by delivering thereat a true copy of each to NORA DINDYAL personally, deponent knew said corporation so served to be the corporation described in said SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT as said defendant/respondent and knew said individual to be AUTHORIZED to accept thereof.

Deponent further states that he describes the person actually served as follows:


<u>Sex</u>	<u>Skin Color</u>	<u>Hair Color</u>	<u>Age (Approx.)</u>	<u>Height (Approx.)</u>	<u>Weight (Approx)</u>
<u>FEMALE</u>	<u>BROWN</u>	<u>BLACK</u>	<u>55</u>	<u>5'4</u>	<u>110</u>
<u>GLASSES</u>					

Sworn to me on: July 12, 2017

Linda Forman
Notary Public, State of New York
No. 01FO5031305
Qualified in New York County
Commission Expires August 1, 2018


Robin Forman
Notary Public, State of New York
No. 01FO6125415
Qualified in New York County
Commission Expires April 18,
2021

Gotham Process Inc.
299 Broadway
New York NY 10007


LARRY YEE
License #: 1159230
Docket #: *1034252*

GREENBRIER HOTEL CORPORATION ET AL

Index #: 17 C 124

Plaintiff(s)

- against -

Date Filed:

ACE AMERICAN INSURANCE COMPANY ET AL

Defendant(s)

AFFIDAVIT OF SERVICE

STATE OF NEW YORK: COUNTY OF NEW YORK ss:

LARRY YEE BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A
PARTY TO THIS ACTION, OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN
THE STATE OF NEW YORK.

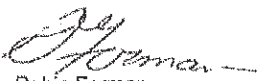

That on July 12, 2017 at 11:08 AM at

BY CT CORPORATION SYSTEM
111 8TH AVENUE
NEW YORK, NY10011deponent served the within true copy of the SUMMONS & FIRST AMENDED
COMPLAINT FOR DECLARATORY COMPLAINT on LLOYDS SYNDICATE MKL, the
defendant/respondent therein named,**CORPORATION** by delivering thereat a true copy of each to NORA DINDYAL personally, deponent knew said corporation so served
to be the corporation described in said SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY
COMPLAINT as said defendant/respondent and knew said individual to be AUTHORIZED to accept thereof.

Deponent further states that he describes the person actually served as follows:

<u>Sex</u>	<u>Skin Color</u>	<u>Hair Color</u>	<u>Age (Approx.)</u>	<u>Height (Approx.)</u>	<u>Weight (Approx.)</u>
<u>FEMALE</u>	<u>BROWN</u>	<u>BLACK</u>	<u>55</u>	<u>5'4</u>	<u>110</u>
<u>GLASSES</u>					

Sworn to me on: July 12, 2017

Linda Forman
Notary Public, State of New York
No. 01FO5031305
Qualified in New York County
Commission Expires August 1, 2018

Robin Forman
Notary Public, State of New York
No. 01FO6125415
Qualified in New York County
Commission Expires April 18,
2021
Gotham Process Inc.
299 Broadway
New York NY 10007

LARRY YEE
License #: 1159230
Docket #: *1034250*

COUNTY OF GREENBRIER

GREENBRIER HOTEL CORPORATION ET AL

Index #: 17 C 124

Plaintiff(s)

- against -

Date Filed:

ACE AMERICAN INSURANCE COMPANY ET AL

Defendant(s)

AFFIDAVIT OF SERVICE

STATE OF NEW YORK: COUNTY OF NEW YORK ss:

LARRY YEE BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION, OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.

That on July 12, 2017 at 11:08 AM at

BY CT CORPORATION SYSTEM
111 8TH AVENUE
NEW YORK, NY10011



deponent served the within true copy of the SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT on LLOYDS SYNDICATE CHN, the defendant/respondent therein named,

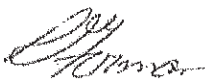
CORPORATION by delivering thereat a true copy of each to NORA DINDYAL personally, deponent knew said corporation so served to be the corporation described in said SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT as said defendant/respondent and knew said individual to be AUTHORIZED to accept thereof.

Deponent further states that he describes the person actually served as follows:


Sex	Skin Color	Hair Color	Age (Approx.)	Height (Approx.)	Weight (Approx)
FEMALE	BROWN	BLACK	55	5'4	110
GLASSES					

Sworn to me on: July 12, 2017

Linda Forman
Notary Public, State of New York
No. 01FO5031305
Qualified in New York County
Commission Expires August 1, 2018


Robin Forman
Notary Public, State of New York
No. 01FO6125415
Qualified in New York County
Commission Expires April 18, 2021

Gotham Process Inc.
299 Broadway
New York NY 10007


LARRY YEE
License #: 1159230
Docket #: *1034253*

COUNTY OF GREENBRIER

GREENBRIER HOTEL CORPORATION ET AL

Index #: 17 C 124

Plaintiff(s)

- against -

Date Filed:

ACE AMERICAN INSURANCE COMPANY ET AL

Defendant(s)

AFFIDAVIT OF SERVICE

STATE OF NEW YORK: COUNTY OF NEW YORK ss:

LARRY YEE BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION, OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.

That on July 12, 2017 at 11:08 AM at



BY CT CORPORATION SYSTEM
111 8TH AVENUE
NEW YORK, NY10011

deponent served the within true copy of the SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT on LLOYDS SYNDICATE 4444 (SOMPO CANOPIUS), the defendant/respondent therein named,

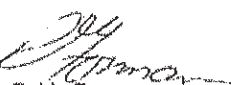
CORPORATION by delivering thereat a true copy of each to NORA DINDYAL personally, deponent knew said corporation so served to be the corporation described in said SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT as said defendant/respondent and knew said individual to be AUTHORIZED to accept thereof.

Deponent further states that he describes the person actually served as follows:

Sex	Skin Color	Hair Color	Age (Approx.)	Height (Approx.)	Weight (Approx)
FEMALE	BROWN	BLACK	55	5'4	110
GLASSES					

Sworn to me on: July 12, 2017

Linda Forman
Notary Public, State of New York
No. 01FO5031305
Qualified in New York County
Commission Expires August 1, 2018


Robin Forman
Notary Public, State of New York
No. 01FO6125415
Qualified in New York County
Commission Expires April 18, 2021

Gotham Process Inc.
299 Broadway
New York NY 10007


LARRY YEE

License #: 1159230

Docket #: *1034258*

IN THE CIRCUIT COURT OF GREENBRIER COUNTY, WEST VIRGINIA

GREENBRIER HOTEL CORPORATION,
THE GREENBRIER SPORTING CLUB, INC.,
GREENBRIER SPORTING CLUB DEVELOPMENT
COMPANY, INC., OLD WHITE CHARITIES, INC.,
and OAKHURST CLUB, LLC,

Plaintiff,

v.

C.A. No. 17-c-124

ACE AMERICAN INSURANCE COMPANY, et al.,

Defendants.

AFFIDAVIT OF SERVICE

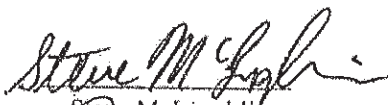
I, Steve McLaughlin, being duly sworn and deposed in the County of New Castle, State of Delaware, states:

I am over eighteen years of age. I am employed by DLSDiscovery, LLC. I am not a party to this action.

On July 10, 2017, I served a true and correct copy of the following document(s):

- Summons
- First Amended Complaint For Declaratory Judgement

on Oil Casualty Insurance, Ltd., Subsidiary of Ashland Global Holdings, Inc., by serving its registered agent Amy McLaren of The Corporation Trust Company, Inc., 1209 N Orange Street, Wilmington, DE 19801.


Steve McLaughlin

July 10, 2017



COUNTY OF GREENBRIER

GREENBRIER HOTEL CORPORATION ET AL

Index #: 17 C 124

Plaintiff(s)

- against -

Date Filed:

ACE AMERICAN INSURANCE COMPANY ET AL

Defendant(s)

AFFIDAVIT OF SERVICE

STATE OF NEW YORK: COUNTY OF NEW YORK ss:

LARRY YEE BEING DULY SWORN DEPOSES AND SAYS DEPONENT IS NOT A PARTY TO THIS ACTION, OVER THE AGE OF EIGHTEEN YEARS AND RESIDES IN THE STATE OF NEW YORK.

That on July 12, 2017 at 11:08 AM at

BY CT CORPORATION SYSTEM
111 8TH AVENUE
NEW YORK, NY10011



deponent served the within true copy of the SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT on NOVAE BERMUDA UNDERWRITING LTD., the defendant/respondent therein named,

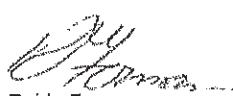
CORPORATION by delivering thereat a true copy of each to NORA DINDYAL personally, deponent knew said corporation so served to be the corporation described in said SUMMONS & FIRST AMENDED COMPLAINT FOR DECLARATORY COMPLAINT as said defendant/respondent and knew said individual to be AUTHORIZED to accept thereof.

Deponent further states that he describes the person actually served as follows:

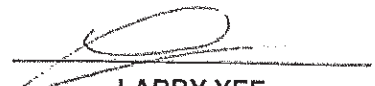
Sex	Skin Color	Hair Color	Age (Approx.)	Height (Approx.)	Weight (Approx)
FEMALE	BROWN	BLACK	55	5'4	110
GLASSES					

Sworn to me on: July 12, 2017

Linda Forman
Notary Public, State of New York
No. 01FO5031305
Qualified in New York County
Commission Expires August 1, 2018


Robin Forman
Notary Public, State of New York
No. 01FO6125415
Qualified in New York County
Commission Expires April 18,
2021

Gotham Process Inc.
299 Broadway
New York NY 10007


LARRY YEE
License #: 1159230
Docket #: *1034240*

AFFIDAVIT OF PROCESS SERVER

In the Circuit Court of Greenbrier County, West Virginia

Greenbrier Hotel Corporation, et al

Plaintiff(s),

VS.

Ace American Insurance Company, et al

Defendant(s).

Attorney: William J. Ihlenfeld, II, Esq.

Bailey & Glasser, LLP
1054 31st St., NW, #230
Washington DC 20007



217764

Case Number: 17-C-124

Legal documents received by Same Day Process Service, Inc. on 07/11/2017 at 3:43 PM to be served upon Resort Hotel Insurance Services, Inc., d/b/a Resort Hotel Insurance Company at 2100 East Cary St., #3, Richmond, VA 23223

I, Staci Crocker, swear and affirm that on July 13, 2017 at 3:14 PM, I did the following:

Served Resort Hotel Insurance Services, Inc., d/b/a Resort Hotel Insurance Company by delivering a conformed copy of the Summons; First Amended Complaint for Declaratory Judgment to Gregory Richle as Authorized Agent of Resort Hotel Insurance Services, Inc., d/b/a Resort Hotel Insurance Company at 2100 East Cary St., #3, Richmond, VA 23223.

Description of Person Accepting Service:

Sex: Male Age: 40s Height: 5ft9in-6ft0in Weight: 161-200 lbs Skin Color: Caucasian Hair Color: Brown

Supplemental Data Appropriate to this Service:

I declare under penalty of perjury that the foregoing information contained in this affidavit is true and correct and that I am a professional process server over the age of 18 and have no interest in the above legal matter.


Staci Crocker
Process Server

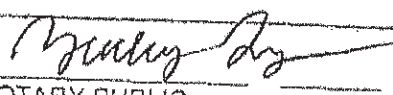
Same Day Process Service, Inc.
1413 K St., NW, 7th Floor
Washington DC 20005

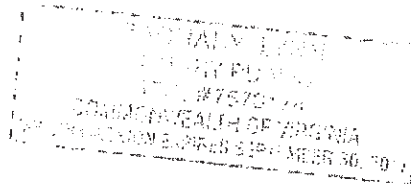
(202)-398-4200

Internal Job ID: 217764



Subscribed and Sworn to before me on the 17
day of July, 2017 by the affiant who
is personally known ☒ or produced identification
_____ to me. Type of identification:


NOTARY PUBLIC



Appearance for Defendant, Liberty Mutual Fire Insurance Company

10:48:34 a.m. 08-07-2017
Circuit Court
Greenbrier Co. W. VA.
JUL 26 PM 4:21

IN THE CIRCUIT COURT OF GREENBRIER COUNTY, WEST VIRGINIA

**GREENBRIER HOTEL CORPORATION,
THE GREENBRIER SPORTING CLUB, INC.,
GREENBRIER SPORTING CLUB DEVELOPMENT
COMPANY, INC., OLD WHITE CHARITIES, INC.,
and OAKHURST CLUB LLC,**

Plaintiffs,

v.

**Civil Action No.: 17-C-124
Judge Richardson**

**ACE AMERICAN INSURANCE COMPANY,
ET AL.,**

Defendants.


NOTICE OF APPEARANCE OF COUNSEL

COMES NOW the undersigned and announces to the Court and counsel of record that Lee Murray Hall and Jenkins Fenstermaker, PLLC shall appear as counsel of record for Defendant Liberty Mutual Fire Insurance Company in the above-styled civil action.

All future correspondence, pleadings, and any and all other documents of any nature whatsoever pertaining to the above-styled civil action should be sent to Lee Murray Hall, Jenkins Fenstermaker, PLLC, Post Office, Box 2688, Huntington, West Virginia 25726.

**LIBERTY MUTUAL FIRE INSURANCE
COMPANY,**

By Counsel


Lee Murray Hall, Esquire (WVSB #6447)
JENKINS FENSTERMAKER, PLLC
Post Office Box 2688
Huntington, WV 25626-2688
Phone: (304) 523-2100
Fax: (304) 523-2347

IN THE CIRCUIT COURT OF GREENBRIER COUNTY, WEST VIRGINIA

GREENBRIER HOTEL CORPORATION,
THE GREENBRIER SPORTING CLUB, INC.,
GREENBRIER SPORTING CLUB DEVELOPMENT
COMPANY, INC., OLD WHITE CHARITIES, INC.,
and OAKHURST CLUB LLC,

Plaintiffs,

v.

Civil Action No.: 17-C-124
Judge Richardson

ACE AMERICAN INSURANCE COMPANY,
ET AL.,

Defendants.

CERTIFICATE OF SERVICE

I, Lee Murray Hall, counsel for Defendant Liberty Mutual Fire Insurance Company, certify that a true and correct copy of the foregoing **Notice of Appearance of Counsel** by depositing a true and correct copy thereof, postage prepaid, in the United States Mail, postage prepaid, to the following counsel of record on the 20th day of July, 2017:

Brian A. Glasser, Esq.
Jonathan R. Marshall, Esq.
William J. Ihlenfeld, II, Esq.
Bailey & Glasser LLP
209 Capitol Street
Charleston, WV 25301
Counsel for Plaintiffs



Lee Murray Hall, Esquire (WVSB #6447)

JENKINS FENSTERMAKER, PLLC
Post Office Box 2688
Huntington, WV 25626-2688



Circuit Court
Greenbrier Co., W. Va.
325 EIGHTH STREET HUNTINGTON, WV 25701
POST OFFICE BOX 2688 HUNTINGTON, WV 25726-2688
P: 304.523.2100 F: 304.523.2347
www.JenkinsFenstermaker.com
2017 JUL 24 PM 4:21

Lee Murray Hall, Esq.
Direct Dial: (304) 399-9704
E-mail: lmh@JenkinsFenstermaker.com
File No.: 8308.0002

July 20, 2017

Louvonne Arbuckle, Clerk
Greenbrier County Circuit Court
P.O. Drawer 751
Lewisburg, WV 24901

Re: Greenbrier Hotel Corporation, et al. v. ACE American Insurance Company, et al.
In the Circuit Court of Greenbrier County, West Virginia
Civil Action No.: 17-C-124

Dear Ms. Arbuckle:

Enclosed for your review and handling, please find the "**Notice of Appearance of Counsel**" in regards to the above-referenced civil action. Additionally, I have enclosed a "**Certificate of Service**" evidencing service of the foregoing on counsel of record.

Should you have any questions regarding the filing of these documents, please do not hesitate to contact me.

Very Truly Yours,

Lee Murray Hall

LMH/mrl
Enclosures

cc (w/encl): Brian A. Glasser, Esq./ Jonathan R. Marshall, Esq./
William J. Ihlenfeld, II, Esq.